

I am writing to request that the FCC withdraw any support or consideration for allowing broadband Internet access over Power Line Communications (PLC) under Part 15 rules, as described in this notice.

As a broadband Internet subscriber and licensed Amateur Radio operator, license KD5UDY, I feel that proven, commercially-viable broadband technologies over the regulated cable, dsl, satellite, and microwave networks have met public need with great success.

Broadband over power lines would offer another Internet option, true, but international studies in Japan, the Netherlands, Austria and other places have consistently shown access PLC generates considerable amounts of harmful interference to licensed radio services across the entire spectrum being proposed for PLC use.

Other studies show that commercially-viable deployments of access PLC in an urban area like Boston, Mass. could create a "radio smog" that caused harmful interference to radio operations as far away as Atlanta, Georgia!

Control PLC has been used in the LF bands without much interference due to its placement in the spectrum.

In-building PLC has already caused interference to licensed services, causing equipment manufacturers to include notch filters in their equipment to reduce their interference to compliance levels.

Access PLC brings the potential of large scale interference, as much as 30dB or more, across large geographic regions, unlike the geographically-limited in-building PLC.

Part 15-compliant interference especially with "extrapolated" results just isn't enough to accurately measure the potential problems access PLC can generate.

Studies have shown the "point-source" oriented testing methods mandated by Part 15 rules can not accurately measure such long-distance sources such as the access PLC long-lines represent.

With all of the real and harmful interference demonstrated in the small-scale tests the Japanese and Dutch have performed, and the potential for inaccurate compliance testing coupled with the geographical scale and level of interference access PLC can create, I seriously urge the FCC to discontinue its support.

I feel that moving forward with allowing access PLC under Part 15 rules does not substantially serve the public interest and, in fact, does exactly the opposite by impacting so many other services with proven track-records of public benefit.

While I feel the Internet should be as widely available as possible, there has to be a better way than an unlicensed service such as this.

Thank you.